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June 17, 2022

By Electronic Filing

The Honorable Loretta A. Preska
United States District Judge
United States District Court for the Southern
District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: SEC v. Sason, et al., 19 Civ. 1459 (LAP) (SDNY)

Dear Judge Preska:

Defendant Marc Manuel, by and through his counsel, hereby requests leave to file under seal exhibits 59, 66, 68, and 69 to the Declaration of Marjorie J. Pearce in support of the Magna Defendants' Motion for Summary Judgment in the above-referenced case, pursuant to the Protective Order in this action (DE 88). These exhibits are Federal Bureau of Investigation Forms 302 and handwritten notes of meetings with Izak Zirk Engelbrecht/de Maison, which were produced, pursuant to *Touhy* requests, by the United States Department of Justice pursuant to the Protective Order, and they contain confidential and sensitive information.

Per discussion with chambers, counsel for Manuel will e-file the sealed documents with "Selected Parties" viewing access and subsequently email PDFs of this letter and those exhibits to the Court.

We are of course available to answer any questions Your Honor may have.

Respectfully,

SO ORDERED.

Dated: June 21, 2022

New York, New York

BALLARD SPAHR LLP

/s/ Marjorie Pearce

Marjorie J. Pearce

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LORETTA A. PRESKA

Senior United States District Judge

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Enclosures

CC: All counsel of record (via ECF)